



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 24, 2015

ELIZABETH BEACHAM WHITE, TREASURER  
B-PAC  
601 PENNSYLVANIA AVENUE NW NORTH BUILDING SUITE 1000  
WASHINGTON, DC 20004

**Response Due Date**  
**04/28/2015**

IDENTIFICATION NUMBER: C00567982

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/16/2014 -  
11/24/2014), RECEIVED 01/30/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. Itemized independent expenditures must include a brief statement or description of why the expenditures were made. Please amend Schedule E of your report to clarify the following description(s): "Production expense." For further guidance regarding acceptable purposes, please refer to 11 CFR §104.3(b)(3).
2. Your committee filed 24 hour reports informing the Commission of independent expenditures made in support or opposition of federal candidates with "Jeremy Boering" and "Redwave Digital" as the payee(s). However, the dates of public dissemination disclosed on these reports do not appear to correlate with the entries on Schedule E, supporting Line 24 for the reporting period. If your committee has filed 24 hour reports supporting independent expenditures not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide further information concerning these reports. (11 CFR §104.4)
3. Schedule D supporting Line 10 of your report discloses debts incurred this period totaling \$125,000 owed to "Cambridge Analytica" for apparent independent expenditures. However, a MEMO Schedule E has not been provided. Please be advised that if a communication is aired in one reporting

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period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report to clarify this apparent discrepancy or provide clarifying information regarding the nature of this debt. (11 CFR §104.4)

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1139.

Sincerely,



Romy Adame-Wilson  
Campaign Finance Analyst  
Reports Analysis Division